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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CREATIVE SURFACES, INC., a South Dakota corporation,

13 Case No.: 2:17-cv-02494-JCM-VCF

14 Plaintiff,

15 vs.

16 LISA CARMONA SWONGER, an individual;

17 Defendant.

18 **STIPULATION AND ORDER TO EXTEND  
19 DISCOVERY AND PRETRIAL DEADLINES**

20 **(FIRST REQUEST)**

21 Defendant Lisa Carmona Swonger (“Defendant”) and Plaintiff Creative Surfaces, Inc. (“Plaintiff”) hereby stipulate to extend the discovery deadline and other pretrial deadlines by sixty days to accommodate the scheduling of depositions. This is the parties’ first request for an extension. In compliance with D. NEV. R. I.A. 6-1 and D. NEV. R. 26-4, the parties submit the following:

22 1. ***Statement of the Discovery Completed to Date.*** In February 2018, the parties made their initial disclosures of documents and witnesses. In May 2018, Plaintiff answered Defendant’s first sets of interrogatories, requests for admissions, and requests for production. Plaintiff has served written discovery to Defendant, and Defendant’s deposition has been noticed for July 3, 2018.

23 2. ***Specific Description of Remaining Discovery.*** The parties wish to take depositions, as well as to serve subpoenas duces tecum and written discovery as needed.

24 3. ***Remaining Discovery that Cannot Be Completed Within the Time Limits Set by the  
25 Discovery Plan.*** Discovery closes on July 6, 2018. The parties have been unable to schedule the depositions they wish to take before that date. That inability has been due to both sides already having depositions and hearings scheduled in other matters in June, the Fourth of July holiday, and the fact Plaintiff’s counsel has a two-week federal jury trial in another case in late June 2018. Furthermore, the parties are presently working together on drafting a proposed stipulated protective order, pursuant to which Plaintiff intends to

1 produce additional documents to Defendant. Defendant will not be in a position to depose Plaintiff's  
2 witnesses until she receives those documents. The parties wish to extend the discovery deadline and other  
3 pretrial deadlines by 60 days to accommodate the depositions.

4. ***Proposed Scheduling Order.*** The parties propose the following modifications to the  
5 existing discovery plan and scheduling order:

Event	Current Deadline	Proposed New Deadline
Amending the Pleadings and Adding Parties	04/06/18	No Change
Initial Expert Disclosure Deadline	05/07/18	No Change
Rebuttal Expert Disclosure Deadline	06/06/18	No Change
Close of Discovery	07/06/18	09/04/18
Dispositive Motion Deadline	08/06/18	10/05/18
Pretrial Order	09/05/18	11/05/18

15 SO STIPULATED on June 7, 2018.  
16 MCNUTT LAW FIRM

If dispositive motions are filed, the deadline for filing the joint  
pretrial order will be suspended until 30 days after  
decision on the dispositive motions or further court order.  
RODRIGUEZ LAW OFFICES, P.C.

17 /s/ Dan McNutt  
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24 **ORDER**

25 IT IS SO ORDERED.  
26



27 UNITED STATES MAGISTRATE JUDGE  
28

6-8-2018  
DATE: \_\_\_\_\_